

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Improving Public Safety Communications in the	)	
800 MHz Band	)	
	)	WT Docket No. 02-55
Consolidating the 900 MHz Industrial/Land	)	
Transportation and Business Pool Channels	)	

To: The Commission

**COMMENTS OF  
FOCUS 2000 COMMUNICATIONS**

Focus 2000 Communications (“Focus”) is a small SMR operator in Las Vegas, Nevada, utilizing conventional technology. Although we agree that there is a serious issue with interference to public safety 800 MHz radio systems, we feel that any type of re-banding is the wrong answer. As a conventional SMR operator, Focus has not caused harmful interference, but has received its share of interference from digital operations.

It is generally accepted that this interference is caused by operations employing digital cellular-type architecture. It seems plainly evident to Focus that even though the digital operators may be operating within the required regulations and specifications as set forth by the FCC, they are the cause of this harmful interference and they should step forward in resolving the problem. Focus believes that this problem is site-specific and

should be addressed as such. Disruption of every 800 MHz licensee in the country is not the way to resolve this issue. Rebanding places the major expense and inconvenience on entities that are, in many cases, not even allowed to make a profit from their radio systems.

Additionally, while it may appear simple to restructure the frequency allocation plan within the 800 MHz band itself, it would be a very difficult process to implement. To assure continuous communications, the first step would be to construct a parallel system, to operate simultaneously with the existing system throughout the transition. In addition to the costs associated with construction and operation of a second system, severe interference would result to all users until the transition was finished. It is not possible for all users to move simultaneously, so for some period of time, operations on channels would be a mix of those who had not yet moved and those who had moved to the new channels. This is simply not workable.

It makes no more sense to consider forcing licensees like Focus out of 800 MHz and into bands not compatible with existing 800 MHz equipment. With no plan for compensation for the cost of buying and installing new equipment, the economic effect would likely force Focus and many like us out of business.

If anyone is forced to make changes, it should be Nextel and any other cellular-like carriers who have tried to turn a dispatch band into a mobile telephone band. Nextel should come up with a solution that it can implement by itself, move to a different band, or shut down. It's that simple. Nextel's original waiver was based on its new technology not causing interference and that it would fix interference problems case-by-case. Nextel should be held to that obligation. Nextel's approach of not wanting its operations

impacted while trying to place the burdens on others to resolve its mistakes would be the worst form of public policy, if adopted. Our country was founded on the concept of government of, by, and for ***the people***, not of, by, and for Nextel. Nextel's best interests do not represent the best interests of the majority of 800 MHz licensees.

I trust you will take our concerns into consideration while exploring options in this Docket.

Respectfully submitted,

J Patrick Barrett  
CFO  
Focus 2000 Communications  
4495 South Polaris Ave.  
Las Vegas, NV 89103